

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH PASTORE

Plaintiff,

v.

C.A. No. 04-12374 REK

REISS INDUSTRIES, LTD. dba HYDRO
COMPONENTS & SYSTEMS, LLC, and
LAMINATIONS, INC.

Defendants.

AFFIDAVIT OF JOHN BRESLIN

I, John Breslin, hereby depose and state as follows:

1. I am the general manager of Laminations, Inc ("Laminations"). I live in Dunmore, Pennsylvania.
2. Laminations is a Pennsylvania corporation with a principal place of business in Scranton, Pennsylvania. Laminations has no business facilities outside the state of Pennsylvania.
3. Laminations is engaged in the business of developing and manufacturing plastic products, specifically, compression molded and extruded polyolefin sheet and slab for commercial, industrial, and architectural applications.
4. Laminations designs and manufactures all its products in Pennsylvania.
5. Laminations has no facilities, sales representatives or other employees in the State of Massachusetts.

6. At no time did I or Laminations conduct any business with Mr. Pastore, or sign any contract with Mr. Pastore or his companies, in Massachusetts. All conversations between Laminations and Mr. Pastore concerning the documents attached as Exhibit E to the Complaint were conducted by phone from my office in Pennsylvania.

7. Laminations never received any confidential materials from Mr. Pastore or his companies, in Massachusetts (or elsewhere).

8. Laminations has manufactured plastic sheeting materials for Hydro Components and Systems, Inc. ("Hydro") These materials were manufactured in Pennsylvania and shipped directly to Hydro in Wisconsin. To my knowledge these materials were not used in any product sent or sold in Massachusetts.

9. All conversations I or Laminations had with representatives of Hydro concerning the alleged agreements attached to the Complaint or the manufacturing of materials for Hydro were conducted via telephone from my office in Pennsylvania.

10. At no time did Laminations conduct any business with Hydro in Massachusetts.

11. Laminations was not a party to, nor was in any way involved with, the HOH Systems Inc. ("HOH") litigation or settlement agreement referred to in Paragraph 9 of the Complaint. Laminations has never had any affiliation with or relationship to HOH.

Signed under pains and penalties of perjury this 14 day of February, 2005.

John Breslin